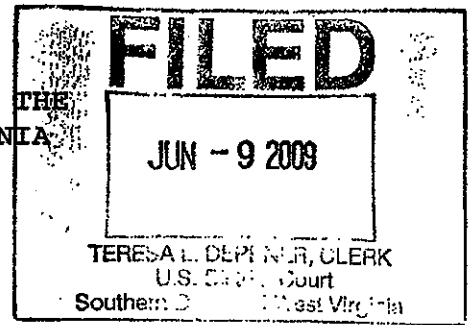


UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
BECKLEY GRAND JURY 2009  
JUNE 9, 2009 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:09-00147  
21 U.S.C. § 846  
21 U.S.C. § 841(a) (1)

JAMMIE L. DAVIS  
ANDREW M. BROWN

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

From in or about January of 2009 to on or about May 13, 2009, at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants JAMMIE L. DAVIS and ANDREW M. BROWN, together with persons whose identities are both known and unknown to the Grand Jury, knowingly conspired to commit offenses in violation of 21 U.S.C. § 841(a) (1), that is, knowingly and intentionally to possess with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

On or about May 13, 2009, at approximately 8:30 p.m., at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant ANDREW M. BROWN knowingly and intentionally distributed a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

On or about May 13, 2009, at approximately 11:00 p.m., at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant ANDREW M. BROWN knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

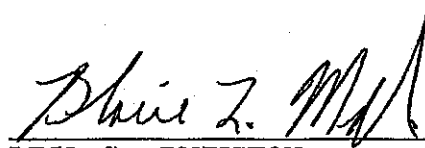
COUNT FOUR

On or about May 13, 2009, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant JAMMIE L. DAVIS knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

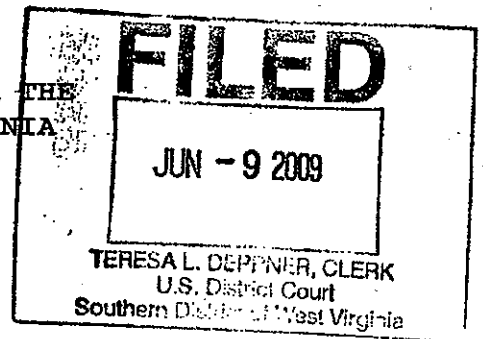
In violation of Title 21, United States Code, Section 841(a)(1).

CHARLES T. MILLER  
United States Attorney

By:

  
\_\_\_\_\_  
LISA G. JOHNSTON  
Assistant United States Attorney

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
BECKLEY GRAND JURY 2009  
JUNE 9, 2009 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:09-00146  
18 U.S.C. § 2250

KEITH EUGENE NELSON

I N D I C T M E N T

The Grand Jury Charges:

1. On or about December 5, 2002, defendant KEITH EUGENE NELSON was convicted in Winnebago County, Illinois of Attempted Criminal Sexual Assault and Criminal Sexual Abuse, felony offenses. As such, defendant KEITH EUGENE NELSON was required to register as a sex offender.

2. On or about December 6, 2004, defendant KEITH EUGENE NELSON registered as a sex offender in Illinois.

3. On or about August 1, 2008, defendant KEITH EUGENE NELSON signed a weekly registration form, pursuant to the Illinois Sex Offender Registration Act, in Rockford, Illinois.

4. At some time after August 1, 2008, defendant KEITH EUGENE NELSON traveled in interstate commerce to West Virginia where he resided in and around Bluefield, Mercer County, West Virginia.

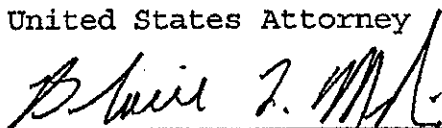
5. Defendant KEITH EUGENE NELSON was required to update his sex offender registration under the Sex Offender Registration and Notification Act, 42 U.S.C. § 16901 et seq. ("the Act"), because he was and is a sex offender as defined for purposes of the Act.

7. At some time after August 1, 2008, through at least on or about April 6, 2009, at or near Bluefield, Mercer County, West Virginia, and within the Southern District of West Virginia, defendant KEITH EUGENE NELSON did knowingly fail to update his registration as required by the Act.

In violation of Title 18, United States Code, Section 2250.

CHARLES T. MILLER  
United States Attorney

By:

  
BLAIRE L. MALKIN  
Assistant United States Attorney